



**Privacy Impact Assessment  
for the**

**Student Aid Internet Gateway (SAIG) Enrollment**

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Contact Point

System Owner: William Leith

Author: Gregory James and Marya Dennis  
Federal Student Aid (FSA)

U.S. Department of Education



## 1. What information will be collected for the system?

### A. Personal:

To enroll in SAIG, a DPA must provide his/her name, business address, phone and fax numbers, email address, Social Security Number (SSN), date of birth, mother's maiden name. Users, under the supervision of the DPA must provide their name, job title, SSN, phone number and signature only to the DPA in their organization.

### B. Institution or Organization:

Information identifying the DPA's institution or organization is collected including: the name of the organization, type of organization (postsecondary institution, third-party servicer, guarantee agency for student loans, or lender/servicer for FFEL Program), whether the DPA will use a personal computer, a mainframe, or both to access SAIG and the name, business address, phone and fax number of the person who should receive correspondence.

### C. DPA's SAIG program and system authorizations:

DPAs must identify the SAIG programs and systems they want to access, such as Pell, Direct Loans and/or NSLDS. The selected FSA systems information is retained within the SAIG database, which is called the Participation Management System. This data is used to identify the systems and programs to which the organization exchanges data.

Specifically, DPAs must indicate which SAIG programs and systems they want to access and provide the following information for each as indicated below:

- To submit and/or receive Direct Loan information: indicate cycle years, name of institution, business address and the TG number if the form is being completed for an existing DPA, and DL code.
- To receive the Direct Loan Borrower Delinquency Report: Whether a report format, data format or both is requested and if the form is being completed for an existing DPA: the TG number and DL code.
- To submit and/or receive CPS data: name of institution, federal institution code, Guaranty agency code, lender code, business address, indicate if applying for an assigned code, indicate cycle years, which DPA will be transmitting and receiving data (all of the following to the same destination point, initial applications, corrections, and ISIRS), and if ISIRs are selected, the delivery option (daily or by request).
- To submit and/or receive Campus-Based Program information (FWS, FSEOG, Perkins): serial number, name of institution, business address, the award year(s) that the institution did or will participate and the corresponding TG number.



- To receive any NSLDS batch files (Financial Aid History/ Transfer Student Monitoring, Enrollment Roster Files (formerly SSCR), Perkins Loan Data, or GA Loan Data): name of institution, GA or lender, institution OPE-ID, GA Code, Lender ID number, business address. The DPA must indicate whether he will use the SAIG electronic mailbox or magnetic tape to exchange files for each program. If magnetic tape: specify type and name and phone number of person to be contacted if the tape is damaged.
- To receive Cohort Default Rate (CDR) Notification Package: name of institution, institution OPE-ID, business address, effective date of action, TG number that will be receiving the CDR and if the DPA is a third-party servicer, the servicer's name.
- To access and update NSLDS information (Enrollment Update, Overpayment Update, GA Loan Online Update, Default Services): indicate which TG number will be accessing on line data, institution OPE-ID number, GA Code and FFEL Program Lender ID number. Third-party servicers need to provide the OPE-ID for the institution to which it needs on-line access.
- To submit data to the quarterly Lender Reporting System (LaRS): name and code of lender/servicer, business address and TG number of the DPA that will be submitting the data.
- To submit and/or receive Pell payment data: institution's name and federal institution Code, business address, indicate cycle years and TG number of the DPA that will be submitting the data.

**D. Service requests:**

The DPA can request that specific services be compiled, created, and sent from SAIG on a routine basis such as the Direct Loan Borrower Delinquency Report. The service request information is retained in SAIG.

**E. DPA Responsibility statement:**

The DPA must sign a statement attesting that he or she will be responsible for accessing only his or her authorized programs and systems, providing accurate information to SAIG, for using SAIG for the intended purpose, and that each SAIG User enrolled under the DPA will also access the system for the only those programs and services authorized by the DPA.

**F. Certification of the President/CEO/Chancellor, or equivalent position, or designee:**

Upon the initial enrollment for the first DPA at an institution or organization, that DPA must obtain a statement from the person holding the highest position in the institution or organization certifying that:

- The DPA's name is on file with the SAIG,



- He/she will immediately notify SAIG Technical support in writing when that person no longer serves as a DPA or as the designated authorized official,
- He/she will not permit unauthorized use or sharing of SAIG passwords or codes that have been issued to any DPA or SAIG User or anyone else,
- Each person who is a DPA for his/her institution, agency, or organization has read, understands, and has signed a statement regarding his or her responsibilities as stated in the SAIG agreement.

#### **G. Non-personal Information We Record – (Use of Cookies)**

**No cookies or other tracking technology are used on the Web site. If you do nothing during your visit but browse through the website, read pages, or download information, our website's operating system will automatically record some general information about your visit.**

During your visit, our web operating system will record:

- The Internet domain for your Internet service, such as "xcompany.com" or "xcompany.net" if you use a private Internet access account, or "yourinstitution.edu" if you connect from a college or university domain.
- The type of browser (such as "Netscape version x" or "Internet Explorer version x") that you are using.
- The type of operating system that you use (such as Macintosh, Unix, or Windows).
- The date and time you visit our site, and the web pages that you visit on our site.
- The address of the previous website you were visiting, if you reached our website through a link from another website rather than reaching our website directly.

The user is not identified in the collection of non-personal information.

#### **H. Links to Other Sites**

Our policy discloses the privacy practices for SAIG. But, SAIG provides links to other websites. When you leave SAIG (<http://www.FSAwebenroll.ed.gov>), you will be going to sites that are beyond our control. We try to ensure that links that leave our site are clearly labeled. These other sites may send their own cookies to users, collect data, or solicit personal information. The privacy policies and procedures described here for SAIG do not apply to any external links. We encourage you to read the privacy policies of any site you link to from ours, especially if you share any personal information. Be informed. You are the person best qualified to protect your own privacy.

## **2. Why is this information being collected?**

It is a Departmental requirement that all postsecondary institutions, guaranty agencies lenders, third party servicers, and state scholarship programs that



wish to electronically exchange data with the Department's Title IV systems via SAIG must register with the Department.

### **3. How will FSA use this information?**

FSA uses the information (1) to authenticate the user as the person at that institution or organization who is authorized to access the SAIG systems requested, (2) as a record of authorization for the DPA by the President/CEO/Chancellor/Executive of the organization, (3) to setup the access to the systems with which the institution wishes to exchange data, and (4) to establish a mailbox (TG Number) via the SAIG mailbox system so the institution can submit and retrieve the data being exchanged.

### **4. Will this information be shared with any other agency or entity? If so, with whom?**

The system notice explains that the information you provide may be disclosed to third parties for discrete purposes. In addition, the information you provide may be shared with another agency for "matching" under the computer matching provisions of the Privacy Act (5 U.S.C. 552a). The agency, through SAIG, is authorized to collect and use the information you provide under the following authorities: Section 141 (b)(2) of the HEA and Executive Order 9397.

The Department of Education may disclose information contained in a record in an individual's account under the routine uses listed in the Privacy Act System of Records notice without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Specific disclosures include the following:

- Freedom of Information Act (FOIA) Advice Disclosure
- Disclosure to the DOJ
- Contract Disclosure
- Litigation and Alternative Dispute Resolution (ADR) Disclosures
- Congressional Member Disclosure
- Disclosure for Use By Law Enforcement Agencies
- Enforcement Disclosure
- FSA Systems: Central Processing System (CPS), Common Origination and Disbursement (COD), National Student Loan Data System (NSLDS), Direct Loan (DL), Fiscal Operations Report and Application to Participate (FISAP). As provided under an altered system notice to be published immediately.



These disclosures may be made on a case-by-case basis. If the Department has complied with the computer matching requirements of the Privacy Act, disclosure also may be made to another agency under a computer matching agreement to verify eligibility and enforce the terms of financial aid agreements.

There will be no sharing of information for purposes outside of the above disclosure requirements or for anything other than the primary purpose(s) of collecting the information. Any contractor responsible for the operations of this Web site is held to the privacy and security requirements of the Department of Education in the handling of information collected through the Web site.

**5. Describe the notice or opportunities for consent that would be or are provided to individuals about the information that is collected and how that information is shared with other organizations.**

The Web site is a government agency website that institutions and organizations access. The Privacy Policy is appropriately posted for Web site users. This is a general policy which applies to the handling of any information collected at the site. The policy highlights the voluntary nature of information collected, and explains which data elements are necessary for each type of functionality. Customers are notified that providing the information constitutes consent to all of its uses and they are given no option to affirmatively consent to specific uses. In addition, the policy notifies customers about the automatic recording and potential uses of any non-personal information about a visit (i.e., site management data).

A Privacy Act Statement is incorporated into the Web site articulating the specific authority for collecting the personal information that will be maintained and retrieved by name or identifier from the system of records, the voluntary nature of the information collected and the uses of the information. A link to the [Privacy Act Statement](#) is provided on each page of the Web site that the SSN is collected or displayed. Users are specifically notified that providing the SSN is voluntary but enrollment to SAIG cannot be established without providing the SSN for this purpose.

**6. How will the information be secured?**

The completion of system security plans is a requirement of the Office of Management and Budget (OMB) Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and Public Law 100-235, "Computer Security Act of 1987." The CPS System's security plan, which includes SAIG Enrollment



Web site, demonstrates the web site's compliance with the IT requirements mandated by federal law and policy. The security plan contains details regarding the Risk Assessment conducted for the Web site, as well as the security controls (hardware/software/facilities/personnel) in place to mitigate any identified risks to the information collected on the Web site.

Management, operational, and technical security controls are in place for the Web site, encompassing personnel, physical environment access, contingency plans, disaster recovery, and identification and authentication procedures. The Web site is currently in the operations/maintenance phase of the life cycle. As such, the following functions are being performed: security operations and administration, operational assurance, audits and monitoring. The System Security Officer (SSO) for the Web site is Gregory James, Management and Program Analyst, (202) 377-3386.

**7. Is a system of records being created or updated with the collection of this Information?**

Yes, a system of records has been created for this collection of information. Users are provided notice of rights under the Privacy Act via links to the agency Privacy Act regulations (5 C.F.R. Part 5b.) and to the Privacy Act system of records notice for the Web site (Student Aid Internet Gateway (SAIG) Participation Management System (SAIG) (70 FR4112 (January 28, 2005)).

**8. List the web addresses (known or planned) that will have a Privacy Policy**

<http://FSAwebenroll.ed.gov>.